UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.

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Larry Roe PR of the estate of Sally Roe		
Plaintiff(s),	MDL No. 2419 Master Docket No. 1:13-md-2419-FDS	
V.	: Honorable F. Dennis Saylor	
UNIFIRST CORPORATION, A/D/B/A UNICLEAN CLEANROOM SERVICES	DEMAND FOR JURY	
Defendant.	:	
CORRECTED SHORT FORM COMPLAINT AGAINST UNAFFILIATED DEFENDANTS		
Plaintiff(s), Larry Roe	, complaining against the	
Defendant, allege(s) as follows:		
FIRST COUNT		
1. Pursuant to MDL Order	No. 7, entered in In Re: New England	
Compounding Pharmacy, Inc. Products liability Litigation, Master Docket No. 1:13-md-		
2419-FDS, the undersigned counsel hereby submit this Short Form Complaint and Jury		
Demand against the Defendant, and adopt and incorporate by reference the allegations		
in the Plaintiffs' Master Complaint, with attachments, and any and all amendments		
thereto.		
2. Plaintiff is resident of the State of Michigan.		

Plaintiff brings this action:

On behalf of herself/himself.

3.

As the repres	sentative of	, who is a living
person.		
	sonal Representative of Sally Roe o died on	(hereinafter
4. Add	ditionally, Larry Roe, is	
✓ Spouse		
Child/Childrer	1	
Other (Set fo	rth)	
of Sally Roe	, is/are a resident(s) of the State	e of Michigan, and is/are
	s an additional plaintiff(s), and claims damage	
5. Pla	intiff asserts that the Plaintiff was admir	nistered a New England
Compounding Ph	narmacy, Inc. ("NECC") drug (hereinafter refe	erred to as "NECC drug"),
causing injuries a	and damages.	
	e aforesaid administration of the NEC	_
MI Pain Specialis	sts Brighton	, Michigan.
7. Pla	intiff(s) adopt(s) and incorporate(s) by refere	nce the following Causes
of Action asserte	d against the Defendants in the Master Comp	plaint:
√	COUNT II: NEGLIGENCE AND GROSS N UniFirst)	NEGLIGENCE (Against
\checkmark	COUNT XIII: LOSS OF CONSORTIUM (A	against UniFirst)

- 8. Plaintiff on behalf of Sally Roe claims to have suffered the following injuries as a result of the administration of NECC's drug: Fungal meningitis and death
- 9. Plaintiff on behalf deceased claims to have suffered the following damages as a result of the administration of NECC's drug economic-noneconomic.
- 10. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer loss of consortium.

WHEREFORE, Plaintiff(s) demand(s) Judgment against the Defendant awarding compensatory damages, punitive damages, attorneys' fees, interest, costs of suit, and such further relief as the Court deems equitable and just.

Plaintiff(s) reserve the right to amend this Complaint to add allegations and claims against individuals or entities currently omitted (in light of the Court's order permitting a Master Complaint naming defendants affiliated with NECC and currently participating in mediation by December 20) and to add or amend allegations against Defendants named herein based, in part, on further discovery.

JURY DEMAND

Plaintiff(s) hereby demand(s) a jury trial.

Respectfully Submitted,

PLAINTIFF(S),

By (Their) Attorneys,

Terry A. Dawes

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Date: May 14, 2014